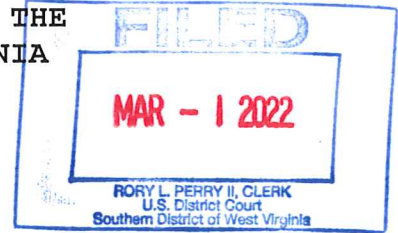


SEALED

UNITED STATES DISTRICT COURT FOR THE
SOUTHERN DISTRICT OF WEST VIRGINIA
BECKLEY GRAND JURY 2021
MARCH 1, 2022 SESSION



UNITED STATES OF AMERICA

v.

CRIMINAL NO. 5:22-cr-00046

BISHEEM JONES

also known as "Bosh"

DERRICK WOODARD

also known as "D"

SHYHEEM WOODARD-SMITH

also known as "Peanut"

also known as "Nut"

HASSAN ABDULLAH

also known as "San"

DENISE JOHNSON

SHAKYRAH ROSS

TYANA BLY

also known as "Biggie"

STEPHANIE COHERNOUR

MAURICE JOHNSON

ARILEAH LACY

also known as "Leah"

TERRI LAWHORN

LAKESHIA NICOLE SIMON

DONTE WEBSTER

18 U.S.C. § 371

18 U.S.C. § 924(n)

18 U.S.C. § 2

18 U.S.C. § 922(g)(1)

18 U.S.C. § 924(a)(1)(A)

I N D I C T M E N T

The Grand Jury charges:

COUNT ONE

1. From in or around June 2020, to in or around July 2021, within the Southern District of West Virginia, and elsewhere, defendants BISHEEM JONES, also known as "Bosh," DERRICK WOODARD, also known as "D," SHYHEEM WOODARD-SMITH, also known as "Peanut," also known as "Nut," HASSAN ABDULLAH, also known as "San," DENISE

JOHNSON, SHAKYRAH ROSS, TYANA BLY, also known as "Biggie," STEPHANIE COHERNOUR, MAURICE JOHNSON, ARILEAH LACY, also known as "Leah," TERRI LAWHORN, LAKESHIA NICOLE SIMON, and DONTÉ WEBSTER, together with persons whose identities are both known and unknown to the Grand Jury, did knowingly conspire to commit offenses against the United States, that is, traveled from Pennsylvania to Fayette, Kanawha, and Raleigh Counties, West Virginia, within the Southern District of West Virginia and elsewhere, and knowingly acquired and attempted to acquire firearms in West Virginia, for the purpose of and in furtherance of the business of reselling the firearms for a profit in Pennsylvania, and at the time of the aforementioned travel, did knowingly intend to engage in the business of dealing in firearms without a license, and that, in the course of such business, to ship, transport, and receive firearms in interstate commerce in violation of Title 18, United States Code, Section 922(a)(1)(A), in violation of Title 18, United States Code, Section 924(n).

Background

At times relevant to the Indictment:

2. Defendants BISHEEM JONES, also known as "Bosh," DERRICK WOODARD, also known as "D," SHYHEEM WOODARD-SMITH, also known as "Peanut," also known as "Nut," HASSAN ABDULLAH, also known as "San," DENISE JOHNSON, SHAKYRAH ROSS, TYANA BLY, also known as "Biggie," STEPHANIE COHERNOUR, MAURICE JOHNSON, ARILEAH LACY, also

known as "Leah," TERRI LAWHORN, LAKESHIA NICOLE SIMON, and DONTE WEBSTER, were not licensed under the provisions of Chapter 44 of Title 18 of the United States Code as a manufacturer, importer, or dealer in firearms.

3. Bare Arms Gun & Pawn, Boggs Gun Shop, Bridgeport Equipment and Tool, Dunham's Sports, Flat Top Arms, Park Center Sporting Goods, Precision Weapons Corporation, Rural King, and Shooter's Roost were Federal Firearms Licensees ("FFLs") required under Chapter 44 of Title 18 of the United States Code to keep information in their records relative to the sale or transfer of firearms and offered firearms for sale to the public.

4. The Bureau of Alcohol, Tobacco, Firearms, and Explosives ("ATF") issues ATF Form 4473, Firearms Transfer Record ("ATF Form 4473"), which is a record that FFLs are required to keep under Chapter 44 of Title 18 of the United States Code.

5. Federal law requires that, upon the purchase and transfer of a firearm from an FFL to an individual, the buyer is required to complete ATF Form 4473.

6. ATF Form 4473 records information concerning the transfer of a firearm from an FFL to another individual, including but not limited to the name, age, and place of residence of the buyer, whether the buyer had been convicted of a crime punishable by imprisonment exceeding one year, and a truthful certification that the buyer was the actual buyer of the firearm.

7. Federal law requires that an FFL engaged in the business of dealing in firearms be licensed by the ATF.

Purpose and Object of the Conspiracy

8. It was the purpose and object of the conspiracy, among others, for members of the conspiracy to unlawfully enrich themselves by obtaining firearms in West Virginia for resale at a profit in Philadelphia, Pennsylvania.

Means and Manner of the Conspiracy

9. It was part of this conspiracy that defendants BISHEEM JONES, also known as "Bosh," DERRICK WOODARD, also known as "D," SHYHEEM WOODARD-SMITH, also known as "Peanut," also known as "Nut," and HASSAN ABDULLAH, also known as "San," DENISE JOHNSON, and SHAKYRAH ROSS, recruited defendants TYANA BLY, also known as "Biggie," STEPHANIE COHERNOUR, MAURICE JOHNSON, ARILEAH LACY, also known as "Leah," TERRI LAWHORN, LAKESHIA NICOLE SIMON, and DONTÉ WEBSTER, along with persons whose identities are both known and unknown to the Grand Jury, to purchase firearms on their behalf. These latter individuals, known as "straw purchasers," were those who, when purchasing a firearm from an FFL, falsely certified on ATF Forms 4473 that they were the actual buyers of firearms, when, in fact, they knew they were purchasing firearms for someone other than themselves.

10. It was further part of this conspiracy that defendants TYANA BLY, also known as "Biggie," STEPHANIE COHERNOUR, MAURICE

JOHNSON, ARILEAH LACY, also known as "Leah," TERRI LAWHORN, LAKESHIA NICOLE SIMON, and DONTE WEBSTER, along with persons whose identities are both known and unknown to the Grand Jury, i.e. the straw purchasers, then knowingly made false statements and representations with respect to information required by provisions of Chapter 44 of Title 18, United States Code, to be kept in the records of persons licensed under Chapter 44, in violation of 18 U.S.C. § 924(a)(1)(A).

11. It was further part of this conspiracy defendant BISHEEM JONES, also known as "Bosh," caused these straw purchases to be conducted so that he could obtain firearms for himself and defendants DERRICK WOODARD, also known as "D," SHYHEEM WOODARD-SMITH, also known as "Peanut," also known as "Nut," and HASSAN ABDULLAH, also known as "San," without there being a record that they were the actual transferees and buyers. Defendants BISHEEM JONES, also known as "Bosh," DERRICK WOODARD, also known as "D," SHYHEEM WOODARD-SMITH, also known as "Peanut," also known as "Nut," and HASSAN ABDULLAH, also known as "San," often accompanied the straw purchasers to FFLs within the Southern District of West Virginia where the straw purchasers, including at least three persons known to the Grand Jury who bought over 70 firearms trafficked as part of the scheme, purchased and then delivered the acquired firearms to members of the conspiracy for transfer out of state to Philadelphia, Pennsylvania.

12. It was further part of this conspiracy that defendants BISHEEM JONES, also known as "Bosh," DERRICK WOODARD, also known as "D," SHYHEEM WOODARD-SMITH, also known as "Peanut," also known as "Nut," and HASSAN ABDULLAH, also known as "San," would and did travel from Pennsylvania to West Virginia to obtain firearms for resale in Pennsylvania.

Overt Acts of the Conspiracy

13. In furtherance of the conspiracy, the following overt acts, among others, were committed in the Southern District of West Virginia and elsewhere:

14. On or about October 2, 2020, defendant BISHEEM JONES, also known as "Bosh," transferred \$2,500 via Walmart2Walmart money transfer from Philadelphia, Pennsylvania to the First Known Person, a straw purchaser, to be picked up at a Walmart store in Fayetteville, Fayette County, West Virginia.

15. On or about October 3, 2020, defendant BISHEEM JONES, also known as "Bosh," transferred \$1,150 via Walmart2Walmart money transfer from Glenolden, Pennsylvania to the First Known Person, a straw purchaser, to be picked up at a Walmart store in Fayetteville, Fayette County, West Virginia.

16. On or about October 17, 2020, defendants BISHEEM JONES, also known as "Bosh," DERRICK WOODARD, also known as "D," SHYHEEM WOODARD-SMITH, also known as "Peanut," also known as "Nut," and HASSAN ABDULLAH, also known as "San," traveled to and were in West

Virginia in order to obtain straw purchased firearms to take back to Philadelphia, Pennsylvania for resale.

17. On or about October 17, 2020, the Second Known Person purchased a Taurus, Model G3C, 9-mm caliber pistol from Flat Top Arms in Beckley, Raleigh County, West Virginia, for defendant BISHEEM JONES, also known as "Bosh."

18. On or about October 17, 2020, the Third Known Person purchased multiple firearms, none of which were for her, for defendant DERRICK WOODARD, also known as "D." The Third Known Person purchased four Taurus, Model G3C, 9-mm caliber pistols from Flat Top Arms in Beckley, Raleigh County, West Virginia on that date.

19. On or about October 19, 2020, defendant BISHEEM JONES, also known as "Bosh," transferred \$500 via Walmart2Walmart money transfer from Glenolden, Pennsylvania to the First Known Person, a straw purchaser, to be picked up at a Walmart store in MacArthur, Raleigh County, West Virginia.

20. On or about on October 19, 2020, defendant DERRICK WOODARD, also known as "D," was arrested in Philadelphia, Pennsylvania after shooting himself in the leg. While incarcerated, he instructed a person known to the Grand Jury to direct defendants BISHEEM JONES, also known as "Bosh," and HASSAN ABDULLAH, also known as "San," to dispose of straw purchased

firearms members of the conspiracy had previously trafficked to Philadelphia, Pennsylvania.

21. On or about November 6, 2020, defendant BISHEEM JONES, also known as "Bosh," transferred \$1,600 via Walmart2Walmart money transfer from Springfield, Pennsylvania to the Third Known Person, a straw purchaser, to be picked up in MacArthur, Raleigh County, West Virginia.

22. On or about March 11, 2021, the First Known Person transferred a firearm, that is, a Ruger, Model LC9S, 9-mm pistol, which he had purchased from Boggs Gun Shop in Charleston, Kanawha County, West Virginia to defendant BISHEEM JONES, also known as "Bosh." On or about that date, this First Known Person and the Second Known Person traveled to a hotel on Harper Road in Beckley, Raleigh County, West Virginia and transferred possession of that firearm to defendant BISHEEM JONES, also known as "Bosh."

23. Between March 26, 2021, and April 10, 2021, defendant BISHEEM JONES, also known as "Bosh," transferred aggregate payments of \$5,050 via Cash App, a social payment service, to defendant TYANA BLY, a straw purchaser.

In violation of Title 18, United States Code, Section 371.

COUNT TWO

1. The Grand Jury re-alleges and incorporates by reference paragraphs 1 through 23 of Count One of this Indictment.

2. On or about October 17, 2020, defendants BISHEEM JONES, also known as "Bosh," DERRICK WOODARD, also known as "D," SHYHEEM WOODARD-SMITH, also known as "Peanut," also known as "Nut," and HASSAN ABDULLAH, also known as "San," aided and abetted by each other, traveled from Pennsylvania to Beckley, Raleigh County, West Virginia, within the Southern District of West Virginia, and elsewhere, and knowingly acquired and attempted to acquire firearms in West Virginia, for the purpose of and in furtherance of the business of reselling the firearms for a profit in Pennsylvania.

3. At the time defendants BISHEEM JONES, also known as "Bosh," DERRICK WOODARD, also known as "D," SHYHEEM WOODARD-SMITH, also known as "Peanut," also known as "Nut," and HASSAN ABDULLAH, also known as "San," aided and abetted by each other, traveled from Pennsylvania to West Virginia as aforesaid, defendants BISHEEM JONES, also known as "Bosh," DERRICK WOODARD, also known as "D," SHYHEEM WOODARD-SMITH, also known as "Peanut," also known as "Nut," and HASSAN ABDULLAH, also known as "San," did knowingly intend to engage in the business of dealing in firearms without a license, and that, in the course of such business, to ship,

transport, and receive firearms in interstate commerce in violation of Title 18, United States Code, Section 922(a)(1)(A).

In violation of Title 18, United States Code, Section 924(n) and Title 18, United States Code, Section 2.

COUNT THREE

1. The Grand Jury re-alleges and incorporates by reference paragraphs 1 through 23 of Count One of this Indictment.

2. On or about March 11, 2021, at or near Beckley, Raleigh County, West Virginia, and within the Southern District of West Virginia, defendant BISHEEM JONES, also known as "Bosh," did knowingly possess a firearm, that is, a Ruger, Model-LC9S, 9-mm pistol, in and affecting interstate commerce.

3. At the time defendant BISHEEM JONES, also known as "Bosh," possessed the aforesaid firearm, he knew he had been convicted of a crime punishable by a term of imprisonment exceeding one year, as defined in 18 U.S.C. § 921(a)(20), that is, convicted on or about March 2, 2010, in the Court of Common Pleas of Montgomery County, Pennsylvania, Case No. CP-46-CR-0003861-2009 of the felony offense of robbery, in violation of 18 Pa.C.S.A. § 3701.

In violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(2).

COUNTS FOUR AND FIVE

1. The Grand Jury re-alleges and incorporates by reference paragraphs 1 through 23 of Count One of this Indictment.

2. On or about the dates hereinafter set forth, and within the Southern District of West Virginia, defendant TYANA BLY, also known as "Biggie," did knowingly make false statements and representations with respect to the information required by the provisions of Chapter 44, Title 18, United States Code to be kept in the records of an FFL, that is, defendant TYANA BLY, also known as "Biggie," stated and represented on ATF Form 4473 that, among other things, she was the transferee and buyer of the firearms purchased when, in fact, as defendant TYANA BLY, also known as "Biggie," well knew, someone other than herself was the true transferee and buyer of the firearms. The allegations in this paragraph are repeated and re-alleged in each of the following Counts Four and Five of this Indictment, as though fully set forth therein:

COUNT	ON OR ABOUT	FFL	FIREARMS
FOUR	March 29, 2021	Shooter's Roost, located at 2301 S. Fayette Street, Beckley, West Virginia 25801	A SCCY CPX-2 9-mm pistol and a Ruger 57 5.7x28caliber pistol

FIVE	April 2, 2021	Shooter's Roost, located at 2301 S. Fayette Street, Beckley, West Virginia 25801	2 SCCY CPX-2 9- mm pistols and a Taurus G3C 9- mm pistol
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Each of the above counts constituting a separate violation of Title 18, United States Code, Section 924(a)(1)(A).

COUNTS SIX AND SEVEN

1. The Grand Jury re-alleges and incorporates by reference paragraphs 1 through 23 of Count One of this Indictment.

2. On or about the dates hereinafter set forth, and within the Southern District of West Virginia, defendant STEPHANIE COHERNOUR did knowingly make false statements and representations with respect to the information required by the provisions of Chapter 44, Title 18, United States Code to be kept in the records of an FFL, that is, defendant STEPHANIE COHERNOUR stated and represented on ATF Form 4473 that, among other things, she was the transferee and buyer of the firearms purchased when, in fact, as defendant STEPHANIE COHERNOUR well knew, someone other than herself was the true transferee and buyer of the firearms. The allegations in this paragraph are repeated and re-alleged in each of the following Counts Six and Seven of this Indictment, as though fully set forth therein:

COUNT	ON OR ABOUT	FFL	FIREARMS
SIX	April 5, 2021	Flat Top Arms, located at 701 South Eisenhower Drive, Beckley, West Virginia 25801	2 Taurus, Model G2C, 9-mm pistols

SEVEN	April 12, 2021	Flat Top Arms, located at 701 S. Eisenhower Drive, Beckley, West Virginia 25801	A Glock, Model 19 Gen 5, 9-mm pistol and a Glock, Model 19X, 9-mm pistol
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Each of the above counts constituting a separate violation of Title 18, United States Code, Section 924(a)(1)(A)n 924(a)(1)(A).

COUNT EIGHT

1. The Grand Jury re-alleges and incorporates by reference paragraphs 1 through 23 of Count One of this Indictment.

2. On or about the dates hereinafter set forth, and within the Southern District of West Virginia, defendant MAURICE JOHNSON did knowingly make false statements and representations with respect to the information required by the provisions of Chapter 44, Title 18, United States Code to be kept in the records of an FFL, that is, defendant MAURICE JOHNSON stated and represented on ATF Form 4473 that, among other things, he was the transferee and buyer of the firearms purchased when, in fact, as defendant MAURICE JOHNSON well knew, someone other than himself was the true transferee and buyer of the firearms.

COUNT	ON OR ABOUT	FFL	FIREARMS
EIGHT	December 29, 2020	Rural King, located at 100 Crossroads Mall, Mount Hope, West Virginia 25880	A HS PRODUKT, Model: XDS MOD. 2 (Springfield Armory), 9-mm pistol and a Ruger, Security-9, 9- mm pistol

In violation of Title 18, United States Code, Section 924(a)(1)(A).

COUNTS NINE THROUGH ELEVEN

1. The Grand Jury re-alleges and incorporates by reference paragraphs 1 through 23 of Count One of this Indictment.

2. On or about the dates hereinafter set forth, and within the Southern District of West Virginia, defendant ARILEAH LACY, also known as "Leah," did knowingly make false statements and representations with respect to the information required by the provisions of Chapter 44, Title 18, United States Code to be kept in the records of an FFL, that is, defendant ARILEAH LACY, also known as "Leah," stated and represented on an ATF Form 4473 that, among other things, she was the transferee and buyer of the firearms purchased when, in fact, as defendant ARILEAH LACY, also known as "Leah," well knew, someone other than herself was the true transferee and buyer of the firearms. The allegations in this paragraph are repeated and re-alleged in each of the following Counts Nine through Eleven of this Indictment, as though fully set forth therein.

COUNT	ON OR ABOUT	FFL	FIREARMS
NINE	April 9, 2020	Flat Top Arms, located at 701 S. Eisenhower Drive, Beckley, West Virginia 25801	A Glock, Model 19 Gen 4, 9- mm caliber pistol, a Kel- Tec, Model PF- 9, 9-mm caliber pistol, and a Glock, Model 30 SF, .45 caliber pistol

TEN	December 31, 2020	Flat Top Arms, located at 701 S. Eisenhower Drive, Beckley, West Virginia 25801	An American Tactical, Model M1911, .45 caliber pistol, and a Ruger, Model SR9C, 9-mm caliber pistol
ELEVEN	April 14, 2021	Flat Top Arms, located at 701 S. Eisenhower Drive, Beckley, West Virginia 25801	A Ruger, Model Ruger-57, 5.7x28 caliber pistol

Each of the above counts constituting a separate violation of Title 18, United States Code, Section 924(a)(1)(A).

COUNTS TWELVE AND THIRTEEN

1. The Grand Jury re-alleges and incorporates by reference paragraphs 1 through 23 of Count One of this Indictment.

2. On or about the dates hereinafter set forth, and within the Southern District of West Virginia, defendant TERRI LAWHORN did knowingly make false statements and representations with respect to the information required by the provisions of Chapter 44, Title 18, United States Code to be kept in the records of an FFL, that is, defendant TERRI LAWHORN stated and represented on an ATF Form 4473 that, among other things, she was the transferee and buyer of the firearms purchased when, in fact, as defendant TERRI LAWHORN well knew, someone other than herself was the true transferee and buyer of the firearms. The allegations in this paragraph are repeated and re-alleged in each of the following Counts Twelve and Thirteen of this Indictment, as though fully set forth therein:

COUNT	ON OR ABOUT	FFL	FIREARMS
TWELVE	December 22, 2020	Shooter's Roost, located at 2301 S. Fayette Street, Beckley, West Virginia 25801	A SCCY CPX-2, 9-mm pistol, a Taurus, Model G2C, 9-mm pistol, and a Taurus, Model G3C, 9-mm pistol

THIRTEEN	December 23, 2020	Rural King, located at 100 Crossroads Mall, Mount Hope, West Virginia 25880	A Glock 44, .22 caliber pistol, a Glock 43, 9-mm pistol, and a Glock 42, .380 caliber pistol
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Each of the above counts constituting a separate violation of Title 18, United States Code, Section 924(a)(1)(A).

COUNTS FOURTEEN AND FIFTEEN

1. The Grand Jury re-alleges and incorporates by reference paragraphs 1 through 23 of Count One of this Indictment.

2. On or about the dates hereinafter set forth, and within the Southern District of West Virginia, defendant LAKESHIA NICOLE SIMON did knowingly make false statements and representations with respect to the information required by the provisions of Chapter 44, Title 18, United States Code to be kept in the records of an FFL, that is, defendant LAKESHIA NICOLE SIMON stated and represented on an ATF Form 4473 that, among other things, she was the transferee and buyer of the firearms purchased when, in fact, as defendant LAKESHIA NICOLE SIMON well knew, defendant someone other than herself was the true transferee and buyer of the firearms. The allegations in this paragraph are repeated and re-alleged in each of the following Counts Fourteen and Fifteen of this Indictment, as though fully set forth therein:

COUNT	ON OR ABOUT	FFL	FIREARMS
FOURTEEN	April 18, 2021	Bridgeport Equipment and Tool, located at 156 Queen Ann Drive, Beckley, West Virginia 25801	A Freedom Ordnance Model FX-9, 9-mm pistol, and 2 Ruger Model 57, 5.7x28 5.7 caliber pistols

FIFTEEN	April 20, 2021	Bridgeport Equipment and Tool, located at 156 Queen Ann Drive, Beckley, West Virginia 25801	2 Ruger Model Ruger 57, 5.7x28 5.7 caliber pistols
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Each of the above counts constituting a separate violation of Title 18, United States Code, Section 924(a)(1)(A).

COUNTS SIXTEEN THROUGH NINETEEN

1. The Grand Jury re-alleges and incorporates by reference paragraphs 1 through 23 of Count One of this Indictment.

2. On or about the dates hereinafter set forth, and within the Southern District of West Virginia, defendant DONTE WEBSTER did knowingly make false statements and representations with respect to the information required by the provisions of Chapter 44, Title 18, United States Code to be kept in the records of an FFL, that is, defendant DONTE WEBSTER stated and represented on an ATF Form 4473 that, among other things, he was the transferee and buyer of the firearms purchased when, in fact, as defendant DONTE WEBSTER well knew, someone other than herself was the true transferee and buyer of the firearms. The allegations in this paragraph are repeated and re-alleged in each of the following Counts Sixteen through Nineteen of this Indictment, as though fully set forth therein:

COUNT	ON OR ABOUT	FFL	FIREARMS
SIXTEEN	June 8, 2021	Bridgeport Equipment and Tool, located at 156 Queen Ann Drive, Beckley, West Virginia 25801	A Glock 19, 9-mm pistol, a Glock 26, 9-mm pistol, a Glock 23, .40 caliber pistol, and a Glock 30GEN4, .45 caliber pistol

SEVENTEEN	July 6, 2021	Bridgeport Equipment and Tool, located at 156 Queen Ann Drive, Beckley, West Virginia 25801	A Glock 19GEN5, 9-mm pistol, a Glock 26GEN5, 9-mm pistol, and a Taurus G2C, 9-mm pistol
EIGHTEEN	July 19, 2021	Bridgeport Equipment and Tool, located at 156 Queen Ann Drive, Beckley, West Virginia 25801	A Glock, Model 35, .40 caliber pistol, a Taurus G3C, 9-mm pistol, a Glock GMBH, .40 caliber pistol, and a Ruger EC9S, 9-mm pistol
NINETEEN	July 21, 2021	Shooter's Roost, located at 2301 S. Fayette Street, Beckley, West Virginia 25801	A Glock GMBH, .40 caliber pistol, and a Smith & Wesson SD40VE, 40 caliber pistol

Each of the above counts constituting a separate violation of Title 18, United States Code, Section 924(a)(1)(A).

FORFEITURE

The allegations contained in Counts One through Nineteen of this Indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeiture pursuant to Title 18, United States Code, Sections 981(a)(1)(C) and 924(d)(1), and Title 28, United States Code, Section 2461.

Pursuant to Title 18, United States Code, Sections 981(a)(1)(C) and 924(d)(1), and Title 28, United States Code, Section 2461, upon conviction of the offenses in violation of Title 18, United States Code, Sections 371 and Title 18, United States Code, Sections 924(n), defendants BISHEEM JONES, also known as "Bosh," DERRICK WOODARD, also known as "D," SHYHEEM WOODARD-SMITH, also known as "Peanut," also known as "Nut," HASSAN ABDULLAH, also known as "San," DENISE JOHNSON, SHAKYRAH ROSS, TYANA BLY, also known as "Biggie," STEPHANIE COHERNOUR, MAURICE JOHNSON, ARILEAH LACY, also known as "Leah," TERRI LAWHORN, LAKESHIA NICOLE SIMON, and DONTE WEBSTER, shall forfeit to the United States of America, pursuant to Title 18, United States Code, Sections 981(a)(1)(C) and 924(d)(1), and Title 28, United States Code, Section 2461, any property, real or personal, constituting, or derived from, any proceeds traceable to the violations charged herein; and any property involved in or used in the violations charged herein.


If any of the property described above, as a result of any act or omission of the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty,

the United States of America shall be entitled to forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p).

WILLIAM S. THOMPSON
United States Attorney

By:



NEGAR M. KORDESTANI
Assistant United States Attorney